

**Maritime Law Association (MLA) Committee Questions**  
**U.S. Government Accountability Office (GAO) review of**  
**U.S. Coast Guard's National Vessel Documentation Center (NVDC) Operations**

GAO is conducting an audit of NVDC operations so as to identify key factors and challenges that affect certificate of documentation (COD) processing times and to report on any management initiatives underway or planned to address these challenges.

In support of this review, GAO is asking members of MLA's Recreational Boating Committee and Marine Financing Committee to consider the following questions and provide written responses. *If you only have experience or interest related to one type of COD—either commercial or recreational—feel free to comment only on that type.*

1. Please provide GAO with your perspective(s) and/or observations with regard to NVDC's COD processing requirements, procedures, customer service, and timeliness for:
  - a. commercial CODs
  - b. recreational CODs
  
2. Your view on what an appropriate length of time might be for CODs to remain effective before renewal is required, *and why*:
  - a. for commercial CODs
  - b. for recreational CODs
  
3. Input on how a change to a multi-year renewal period should be implemented—to include COD renewal fees associated with the change—*and why*:
  - a. for commercial CODs
  - b. for recreational CODs

The Coast Guard Authorization Act of 2015 requires the Coast Guard to issue regulations by February 2017 that will “make certificates of documentation for recreational vessels effective for 5 years.” Please provide your perspective(s) and/or observations on the following:

4. Any current or potential (future) impacts or consequences of this change, whether direct or indirect, on relevant stakeholders—including the maritime industry, lenders, NVDC customers, or the NVDC itself—
  - a. *positive* impacts or consequences
  - b. *negative* impacts or consequences.